

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS DANIEL TO INTERROGATORY OF
THE NEWSPAPER ASSOCIATION OF AMERICA
(NAA/USPS-T29-9)

The United States Postal Service hereby provides the response of witness Daniel to the following interrogatory of the Newspaper Association of America: NAA/USPS-T29-9, filed on September 16, 1997.

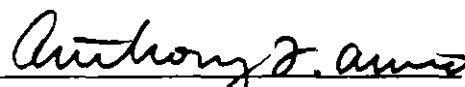
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anthony F. Alverno

475 L'Enfant Plaza West, S.W.
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September 30, 1997

**RESPONSE OF U.S. POSTAL SERVICE WITNESS DANIEL TO
INTERROGATORY OF NEWSPAPER ASSOCIATION OF AMERICA**

NAA/USPS-T29-9.

Please refer to your response to NAA/USPS-T29-4. You state Ideally, only non-transportation cost savings would have been added to the ECR mail processing costs.”

- a. Please explain why both transportation and non-transportation costs savings were added to the ECR mail processing costs instead of adding only non-transportation costs.
- b. Please provide a copy of Exhibit USPS-29C, page 2 with only non-transportation costs added to ECR mail processing costs. If you cannot provide this revised exhibit, please explain why not.

RESPONSE:

a-b. Transportation costs should not have been added for this purpose. A corrected page 2 to Exhibit USPS-29C will be filed in conjunction with other changes.

DECLARATION

I, Sharon Daniel, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.


SHARON DANIEL

Dated: September 30, 1997

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Anthony F. Alverno

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